



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

---

*Jacob K. Javitz Federal Building  
26 Federal Plaza  
New York, New York 10278*

March 31, 2025

**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Do Hyeong Kwon*, 23 Cr. 151 (PAE)**

Dear Judge Engelmayer:

The Government writes to provide a discovery update to the Court in advance of the next conference in this matter, currently scheduled for April 9, 2025 at 10:30 a.m.

The Government anticipates that its Rule 16 discovery (excepting expert discovery) will be substantially complete by this coming Wednesday, April 2, when the Government expects to make its fifth production to the defense. Once that fifth production has been made, the remaining outstanding discovery will principally consist of trading data from one cryptocurrency exchange. The timing of the production of that outstanding material will depend on the resolution of several technical issues arising from the size of the data set, and the Government hopes to resolve those issues in a matter of weeks. Because that material consists of third-party trading data, the Government does not foresee a likelihood of pretrial motion practice relating to this data.

The Government notes that its investigation in this matter is ongoing and therefore may generate additional Rule 16 discovery; to the extent that occurs, the Government plans to produce any such materials to the defense promptly on a rolling basis. Further, in light of the substantial amount of discovery materials in this case, the Government notes that it is conducting additional reviews of its files as a quality control measure to ensure that all discoverable records have been produced. To the extent any such materials are identified, they will be produced promptly.

Respectfully submitted,

MATTHEW PODOLSKY  
Acting United States Attorney

by:



Marguerite B. Colson  
Jared Lenow  
Sarah Mortazavi  
Kimberly Ravener  
Assistant United States Attorneys  
United States Attorney's Office for the  
Southern District of New York

Cc (by ECF):

Mike Ferrara, Esq.  
Sean Hecker, Esq.  
David Patton, Esq.  
Christopher Morel, Esq.  
Andrew Chesley, Esq.  
Hecker Fink LLP

The Court appreciates this update. For avoidance of doubt, the status conference next week is scheduled for April 10 (not April 9 as stated above).

4/1/2025

SO ORDERED.



PAUL A. ENGELMAYER  
United States District Judge